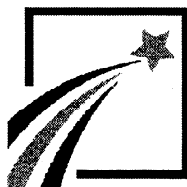


AD4-00326



***National
Environmental
Achievement Track***

Application Form

JVC Magnetics America Company

Name of facility

JVC America, Inc.

Name of parent company (if any)

1 JVC Road

Street address

Street address (continued)

Tuscaloosa, AL 35405

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Mr. Ron McClenny

Title Senior V.P Production

Phone 205 556-7111

Fax 205-554-5500

E-mail rmccclenny@jvcmedia.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

JVC Magnetics America Company produces magnetic and optica recording media (e.g., VHS tape)

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
3695

NAICS
334613

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☒ Yes

☐ No

4 How many employees (full-time equivalents) currently work at your facility?

☐ Fewer than 50

☐ 50-99

☒ 100-499

☐ 500-1,000

☐ More than 1,000

Section A, continued

5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

ALD 982 115 180

6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

8 Optional: Is there anything else you would like to tell us about your facility?

Why do we need this information?

Facilities must have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

- | | |
|-----------------------------------|---|
| a. Environmental policy | <input checked="" type="checkbox"/> Yes |
| b. Planning | <input checked="" type="checkbox"/> Yes |
| c. Implementation and operation | <input checked="" type="checkbox"/> Yes |
| d. Checking and corrective action | <input checked="" type="checkbox"/> Yes |
| e. Management review | <input checked="" type="checkbox"/> Yes |

2 Have you completed at least one EMS cycle (plan-do-check-act)? ☒ Yes

3 Did this cycle include both an EMS and a compliance audit? ☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS? ☒ Yes

If yes, what method of EMS assessment did you use?

☐ Self-assessment

☐ GEMI

☐ Other

☐ CEMP

☒ Third-party assessment

☒ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities must show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you are required to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Hazardous Material Use	3.252	cf N2 /VHS piece	1.865	cfN2 /VHS piece
<p>i. How is the current level an improvement over the previous level?</p> <p>JMA reduce the amount of virgin high pressure nitrogen use in the manufacturing process by approximately 40%.</p>				
<p>ii. How did you achieve this improvement?</p> <p>JMA converted a high pressure Nitrogen Tank to a low pressure nitrogen buffer tank. Low pressure nitrogen generated by the on-site condenser is then stored in the low pressure tank to be utilized in low pressure nitrogen applications. Prior to the low pressure buffer tank, low pressure nitrogen applications was supplied by virgin high pressure nitrogen, reduced in pressure. With installatin of the buffer tank, amount of virgin nitrogen has been reduced.</p>				

Section C, continued

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Recycled/Re-Used Material Use	586.09	tons	18.90	tons
<p>i. How is the current level an improvement over the previous level?</p> <p>JMA reduced the use of virgin cardboard from 586.09 tons/ month to 18.90 tons/month based on an average production rate of 11,000,000 pieces per month. Based on this data, the savings in cardboard use amounts to 6806.25 tons per year.</p>				
<p>ii. How did you achieve this improvement?</p> <p>JMA purchased plastic "R" pack containers for the packaging of bulk VHS tape to certain customers. These "R" packs are reused in lieu of disposable cardboard packaging material.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this section.

Note to small facilities: If you are a small facility, you are required to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect? Hazardous Solid Waste
- b. Is this aspect identified as significant in your EMS? ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A: Absolute value 39,000 gals of solvent waste from Carbon Bed Units (Quantity/Units)
- ☐ Option B: In terms of units of production or output (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 0 gals of solvent waste from Carbon Units (Quantity/Units)
- ☐ Option B:
In terms of units of production or output (Quantity/Units)

e. How will you achieve this improvement?

Replace the current Carbon Adsorption Bed units utilized for pollution control of VOC emissions with a condensor. The recovered solvent from the Carbon units is not suitable for reuse in JVC's operation and has to be managed as a hazardous waste. The replacement of the Carbon Units with a condensor will enable the captured and recovered solvent to be reused in JVC's production operation, thus eliminating the recovered solvent from the carbon units from JVC's hazardous waste stream.

Second aspect you've selected

a. What is the aspect?

Emissions of VOCs

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of units of production or output .003744 lbs/VHS piece (Quantity/Units)

d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output.

- ☐ Option A:
Absolute value (Quantity/Units)
- ☒ Option B:
In terms of units of production or output .003557 lbs/VHS piece (Quantity/Units)

e. How will you achieve this improvement?

Replace Carbon bed recovery unit with condensor to capture VOC's prior to emission exhaust and increase efficiency of coating operation through ongoing equipment modifications. The target for VOC emission reduction per VHS piece is 5%.

Third aspect you've selected

- | | | | | | |
|---|---|--|------------------|--|--|
| a. What is the aspect? | Total Material Use | | | | |
| b. Is this aspect identified as significant in your EMS? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | | | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <table border="0"><tr><td><input type="checkbox"/> Option A:
Absolute value</td><td>(Quantity/Units)</td></tr><tr><td><input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output</td><td>24.2 rolls of VHS
tape/batch of
magnetic paint
(Quantity/Units)</td></tr></table> | <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 24.2 rolls of VHS
tape/batch of
magnetic paint
(Quantity/Units) |
| <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | | | | |
| <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 24.2 rolls of VHS
tape/batch of
magnetic paint
(Quantity/Units) | | | | |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <table border="0"><tr><td><input type="checkbox"/> Option A:
Absolute value</td><td>(Quantity/Units)</td></tr><tr><td><input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output</td><td>26.1 rolls of VHS
tape/batch of
magnetic paint
(Quantity/Units)</td></tr></table> | <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 26.1 rolls of VHS
tape/batch of
magnetic paint
(Quantity/Units) |
| <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | | | | |
| <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 26.1 rolls of VHS
tape/batch of
magnetic paint
(Quantity/Units) | | | | |
| e. How will you achieve this improvement? | Reduce total material usage through reformulation of product ingrediance to reduce magnetic paint thickness. | | | | |

Fourth aspect you've selected

- | | | | | | |
|---|--|--|------------------|--|--|
| a. What is the aspect? | Recycled/Re-Used Materials Use | | | | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <table border="0"><tr><td><input type="checkbox"/> Option A:
Absolute value</td><td>(Quantity/Units)</td></tr><tr><td><input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output</td><td>0.0570 lbs solvent/ VHS
piece
(Quantity/Units)</td></tr></table> | <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 0.0570 lbs solvent/ VHS
piece
(Quantity/Units) |
| <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | | | | |
| <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 0.0570 lbs solvent/ VHS
piece
(Quantity/Units) | | | | |
| d. What is the improvement you are committing to over the next three years? You may choose to state this as an absolute value or in terms of units of production or output. | <table border="0"><tr><td><input type="checkbox"/> Option A:
Absolute value</td><td>(Quantity/Units)</td></tr><tr><td><input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output</td><td>0.0598 lbs solvent/VHS
piece
(Quantity/Units)</td></tr></table> | <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 0.0598 lbs solvent/VHS
piece
(Quantity/Units) |
| <input type="checkbox"/> Option A:
Absolute value | (Quantity/Units) | | | | |
| <input checked="" type="checkbox"/> Option B:
In terms of
units of production
or output | 0.0598 lbs solvent/VHS
piece
(Quantity/Units) | | | | |

e. How will you achieve this improvement?

Revise formulation of magnetic paint additive to allow an increased use of recycled solvent recovered on-site. The targeted increase in recycled solvent use per piece of VHS piece is 5%.

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities must demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

External communications through the External affairs Department

2 How do you inform community members of important matters that affect them?

Environmental Policy through Internet, Visitor information card, and response to external communication requests.

3 How will you make the Achievement Track Annual Performance Report available to the public?

- ☒ Website www.jvcmedia.com
- ☐ Newspaper
- ☐ Open Houses
- ☐ Other

- 4 Are there any ongoing citizen suits against your facility? ☐ Yes ☒ No

If yes, describe briefly in the right-hand column.

5 List references below

	Organization	Name	Phone number
Representative of a Community/ Citizen Group	Tuscaloosa Development Authority	Mr. Allen Harper	205-349-1414
State/Local Regulator	Alabama Department of Environmental Mangement	Mr. Larry Brown	344-271-7700
Other community/local reference	West Alabama Chamber of Commerce	Mr. Johnny Aycock, Director	205-758-7588

Section E

Application and Participation Statement

On behalf of JVC Magnetics America Company
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all applicable federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date *Ron McClenny 9/27/00*

Printed Name/Title Mr. Ron McClenny, Sr. V.P. Production

Facility Name JVC Magnetics America Company

Facility Street Address 1 JVC Road

Facility ID Numbers ALD 982 115 180

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
Cambridge, MA 02140

National Environmental Achievement Track

Environmental Requirements Checklist

The following Checklist is provided to assist facilities in answering Section A, "Tell us about your facility," Question 6. The Checklist is given to help facilities identify the major federal, state, tribal, and local environmental requirements applicable at their facilities. The Checklist is not intended to be an exhaustive list of all environmental requirements that may be applicable at an individual facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Facility Name JVC Magnetics America Company
Facility Location: 1 JVC Road, Tuscaloosa, AL 3540
Facility ID Number(s): ALD 982 115 180; 413-0040 (ADEM Air Facility Number)
(attach additional sheets if necessary)

Air Pollution Regulations

Check All
That Apply

1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61) ☒
2. Permits and Registration of Air Pollution Sources ☒
3. General Emission Standards, Prohibitions and Restrictions ☒
4. Control of Incinerators ☐
5. Process Industry Emission Standards ☐
6. Control of Fuel Burning Equipment ☒
7. Control of VOCs ☒
8. Sampling, Testing and Reporting ☒
9. Visible Emissions Standards ☒
10. Control of Fugitive Dust ☒
11. Toxic Air Pollutants Control ☒
12. Vehicle Emissions Inspections and Testing ☐

Other Federal, State, Tribal or Local Air Pollution Regulations Not Listed Above
(identify)

13. ☐
14. ☐

Hazardous Waste Management Regulations

1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - Characteristic Waste ☒
 - Listed Waste ☒
2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - Manifesting ☒

- Pre-transport requirements ☒
- Record keeping/reporting ☒
- 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - Transfer facility requirements ☐
 - Manifest system and record-keeping ☐
 - Hazardous waste discharges ☐
- 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)
 - General facility standards ☐
 - Preparedness and prevention ☐
 - Contingency plan and emergency procedures ☐
 - Manifest system, Record keeping and reporting ☐
 - Groundwater protection ☐
 - Financial requirements ☐
 - Use and management of containers ☐
 - Tanks ☐
 - Waste piles ☐
 - Land treatment ☐
 - Incinerators ☐
- 5. Interim Status Standards for TSD Owners and Operators (40 CFR 265) ☐
- 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267) ☐
- 7. Administered Permit Program (Part B) (40 CFR 270) ☐

Other Federal, State, Tribal or Local Hazardous Waste Management Regulations Not Listed Above (identify)

- 8. ☐
- 9. ☐

Hazardous Materials Management

- 1. Control of Pollution by Oil and Hazardous Substances (33 CFR 153) ☐
- 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302) ☒
- 3. Hazardous Materials Transportation Regulations (49 CFR 172-173) ☒
- 4. Worker Right-to-Know Regulations (29 CFR 1910.1200) ☒
- 5. Community Right-to-Know Regulations (40 CFR 350-372) ☒

Other Federal, State, Tribal or Local Hazardous Materials Management Regulations Not Listed Above (identify)

- 6. ☐
- 7. ☐

Solid Waste Management

- 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257) ☐
- 2. Permit Requirements for Solid Waste Disposal Facilities ☐
- 3. Installation of Systems of Refuse Disposal ☒

4. Solid Waste Storage and Removal Requirements ☐
5. Disposal Requirements for Special Wastes ☒

Other Federal, State, Tribal or Local Solid Waste Management Regulations Not Listed Above (identify)

6. ☐
7. ☐

Water Pollution Control Requirements

1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112) ☒
2. Designation of Hazardous Substances (40 CFR 116) ☒
3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117) ☒
4. NPDES Permit Requirements (40 CFR 122) ☒
5. Toxic Pollutant Effluent Standards (40 CFR 129) ☐
6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403) ☐
7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414) ☐
8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415) ☐
9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416) ☐
10. Water Quality Standards ☐
11. Effluent Limitations for Direct Dischargers ☐
12. Permit Monitoring/Reporting Requirements ☐
13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants ☐
14. Collection, Handling, Processing of Sewage Sludge ☐
15. Oil Discharge Containment, Control and Cleanup ☒
16. Standards Applicable to Indirect Discharges (Pretreatment) ☐

Other Federal, State, Tribal or Local Water Pollution Control Regulations Not Listed Above (identify)

17. ☐
18. ☐

Drinking Water Regulations

1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146) ☐
2. National Primary Drinking Water Standards (40 CFR 141) ☐
3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141) ☐
4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources ☐
5. Underground Injection Control Requirements ☐

6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems ☐

Other Federal, State, Tribal or Local Drinking Water Regulations Not Listed Above(identify)

7. ☐
8. ☐

Toxic Substances

1. Manufacture and Import of Chemicals, Record keeping and Reporting Requirements (40 CFR 704) ☐
2. Import and Export of Chemicals (40 CFR 707) ☐
3. Chemical Substances Inventory Reporting Requirements (40 CFR 710) ☐
4. Chemical Information Rules (40 CFR 712) ☐
5. Health and Safety Data Reporting (40 CFR 716) ☐
6. Pre-Manufacture Notifications (40 CFR 720) ☐
7. PCB Distribution Use, Storage and Disposal (40 CFR 761) ☐
8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762) ☐
9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775) ☐

Other Federal, State, Tribal or Local Toxic Substances Regulations Not Listed Above (identify)

10. ☐
11. ☐

Pesticide Regulations

1. FIFRA Pesticide Use Classification (40 CFR 162) ☐
2. Procedures for Disposal and Storage of Pesticides and Containers (40 CFR 165) ☐
3. Certification of Pesticide Applications (40 CFR 171) ☐
4. Pesticide Licensing Requirements ☐
5. Labeling of Pesticides ☐
6. Pesticide Sales, Permits, Records, Application and Disposal Requirements ☐
7. Disposal of Pesticide Containers ☐
8. Restricted Use and Prohibited Pesticides ☐

Other Federal, State, Tribal or Local Pesticides Regulations Not Listed Above (identify)

9. ☐
10. ☐

Environmental Clean-Up, Restoration, Corrective Action

1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (identify) ☐
☐

2. RCRA Corrective Action (identify)

☐
☐

**Other Federal, State, Tribal or Local Environmental Clean-Up, Restoration,
Corrective Action Regulations Not Listed Above (identify)**

3.

☐
☐

4.